

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,¹

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

Re: Docket No. _____

**ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY
AND MODIFYING ANY PLAN INJUNCTION**

Upon consideration of the Motion of Daniel Larsen and Nelia Lopez (“Movants”) for entry of an order pursuant to section 362(d) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 4001 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 4001-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that no other or further notice need be provided; and after due deliberation and for the reasons set forth in the Motion, the Court finds that “cause” exists to lift the automatic stay under section 362 of the Bankruptcy Code and modify any plan injunction; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is hereby GRANTED as set forth herein.

¹ The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

2. Pursuant to section 362(d) of the Bankruptcy Code, the automatic stay of section 362(a) of the Bankruptcy Code is hereby lifted, and any plan injunction is modified, to allow Movants to (a) file and prosecute the a lawsuit (and enforce any judgment obtained on account of the same) against the debtor Franchise Group, Inc.; and (b) recover any final judgment or settlement against the Debtors solely from proceeds of its insurance policy(ies), if any, and not from the Debtors, their estates, or their successors, and subject to any applicable limit, self-insured retention, or deductible in the insurance policy(ies).

3. Nothing herein shall prevent or otherwise limit Movant from recovering from any non-Debtor entities or individuals in connection with her claims.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

THE HONORABLE LAURIE SELBER SILVERSTEIN
United States Bankruptcy Judge